

EXHIBIT A

<p>1 UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS</p> <p>2</p> <p>3 In re: NEURONTIN MARKETING, SALES MDL DOCKET NO: 1 PRACTICES, AND PRODUCTS LIABILITY LITIGATION Master File No. 04-10981</p> <p>4</p> <p>5</p> <p>6 THIS DOCUMENT RELATES TO: 7 ALL PRODUCTS LIABILITY ACTIONS</p> <p>8</p> <p>9</p> <p>10 VIDEOTAPED DEPOSITION OF: CHERYL D. BLUME, Ph.D. 11 DATE: November 12, 2007 12 TIME: 9:25 a.m. to 6:07 p.m. 13 PLACE: 13902 North Dale Mabry Highway Suite 122 Tampa, Florida</p> <p>14 PURSUANT TO: Notice by counsel for 15 Defendants for purposes 16 of discovery, use at 17 trial or such other purposes as are permitted under the Federal Rules of Civil Procedure</p> <p>18 BEFORE: VALERIE A. HANCE, RPR 19 Notary Public, State of 20 Florida at Large 21 Volume 1 Pages 1 to 370</p> <p>22 23 24 25</p>	<p>3</p> <p>1 INDEX</p> <p>2 PAGE</p> <p>3 DIRECT EXAMINATION BY MR. BARNES..... 6</p> <p>4 CERTIFICATE OF OATH..... 369</p> <p>5 REPORTER'S CERTIFICATE..... 370</p> <p>6</p> <p>7 EXHIBITS</p> <p>8 ID MARK</p> <p>9 1 First Amended Notice of 9 9 Videotaped Deposition Duces Tecum of Cheryl D. Blume, Ph.D.</p> <p>10 2 Hard Drive (Retained by counsel)..... 13 13</p> <p>11 2A Directory of Contents on Hard Drive..... 14</p> <p>12 3 Disk of Neurontin/gabapentin 14 14 Bibliography</p> <p>13 3A Directory of Documents Found on Disk.... 15 14</p> <p>14 4 Exhibit Number Skipped..... 35</p> <p>15 5 Notebook..... 36 36</p> <p>16 6 Correspondence and Communications 36 36 Removed from Notebook (Exhibit 4)</p> <p>17 7 Disk In Re: Neurontin Keith Altman 45 45 ADE Files (10/28/07)</p> <p>18 8 Yellow Legal Paper for Requested 117 117 Formula</p> <p>19 9 Guidance for Industry, Good 118 118 Pharmacovigilance Practices and 20 Pharmacoeconomic Assessment, 21 March 19th, 2005, Clinical Medical</p> <p>22 10 Map of Terms for Suicidal and 160 159 Self-Injurious Behaviors</p> <p>23 11 Pharmacoeconomic Assessment, Fourth Edition, .. 164 164 by Brian Strom (Page 171)</p> <p>24 25</p>
<p>2</p> <p>1 APPEARANCES:</p> <p>2 KENNETH B. FROMSON, ESQUIRE Finkelstein & Partners 3 785 Broadway 3rd Floor 4 Kingston, New York 12401 (800) 634-1212 Ext. 2755 Attorney for Plaintiffs</p> <p>5 RICHARD M. BARNES, ESQUIRE 6 MICHAEL J. WASICKO, ESQUIRE 7 Goodell, DeVries, Leech & Dann, LLP One South Street 8 20th Floor Baltimore, Maryland 21202 (410) 783-4000</p> <p>9 -and-</p> <p>10 VINCENT E. GUNTER, ESQUIRE 11 LORI C. MCGRODER, ESQUIRE (via telephone) Shook, Hardy & Bacon, LLP 12 2555 Grand Boulevard Kansas City, Missouri 64108-2613 13 (816) 474-6550 Attorneys for Defendant, Pfizer, Inc.</p> <p>14 ANNAMARIE A. DALEY, ESQUIRE (via telephone) 15 Robins, Kaplan, Miller & Ciresi L.L.P. 2800 LaSalle Plaza 16 800 LaSalle Avenue Minneapolis, Minnesota 55402 17 (612) 349-8500 Attorney for Plaintiff, Assurant</p> <p>18 ELANA GOLD, ESQUIRE (via telephone) 19 Law Office of Steven Hillyard 345 California Street 20 Suite 1770 San Francisco, California 94104 21 (415) 334-6880 Attorney for Raymond Jennings, M.D.</p> <p>22 ALSO PRESENT: 23 KEITH ALTMAN, Finkelstein & Partners 24 DAVID LEGGETT, Videographer 25</p>	<p>4</p> <p>1 EXHIBITS (Continued)</p> <p>2 ID MARK</p> <p>3 12 Composite, Graphs (7)..... 178 175</p> <p>4 13 Photograph..... 196 196</p> <p>5 14 Photograph..... 197 197</p> <p>6 15 PDG Financials..... 249 249</p> <p>7 16 Collins-McFarland Research Report - 346 346 Divalproex, lithium and suicide among Medicaid patients with bipolar disorder</p> <p>8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

<p style="text-align: right;">371</p> <p>1 UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS</p> <p>2</p> <p>3 In re: NEURONTIN MARKETING, SALES MDL DOCKET NO: 1 PRACTICES, AND PRODUCTS LIABILITY LITIGATION Master File No. 04-10981</p> <p>4</p> <p>5 _____/</p> <p>6 THIS DOCUMENT RELATES TO: 7 ALL PRODUCTS LIABILITY ACTIONS</p> <p>8 _____/</p> <p>9</p> <p>10 VIDEOTAPED DEPOSITION OF: CHERYL D. BLUME, Ph.D. 11 DATE: November 13, 2007 12 TIME: 9:06 a.m. to 6:08 p.m. 13 PLACE: 13902 North Dale Mabry Highway Suite 122 Tampa, Florida</p> <p>14 PURSUANT TO: Notice by counsel for 15 Defendants for purposes 16 of discovery, use at trial or such other 17 purposes as are permitted under the Federal Rules of Civil Procedure</p> <p>18 BEFORE: VALERIE A. HANCE, RPR 19 Notary Public, State of 20 Florida at Large 21 Volume 2 Pages 371 to 722</p> <p>22 23 24 25</p>	<p style="text-align: right;">373</p> <p>1 INDEX</p> <p>2 PAGE</p> <p>3 DIRECT EXAMINATION BY MR. BARNES (CONTINUED)</p> <p>4 WITNESS' SIGNATURE PAGE..... 720</p> <p>5 CERTIFICATE OF OATH..... 721</p> <p>6 REPORTER'S CERTIFICATE..... 722</p> <p>7</p> <p>8 EXHIBITS</p> <p>9 ID MARK</p> <p>10 17 "Conclusiveness of rechallenge in 441 440 the interpretation of adverse drug reactions"</p> <p>11 18 Chart "PRR Over Time Completed 462 461 Suicide (PT) Serious Reports</p> <p>12 19 Integrated Summary of Safety 513 512 Information</p> <p>13 20 First Safety Update Following the 517 516 Submission of the ISS (5/29/92)</p> <p>14 21 Medical Review - Application Number 533 533 21-397/21-423/21-424</p> <p>15 22 Affidavit of Cynthia McCormick..... 552 550</p> <p>16 23 Citizen Petition..... 602 602</p> <p>17 24 Letter from Russell Katz, M.D., to 615 615 Andrew G. Finkelstein (April 12, 2005)</p> <p>18 25 Neurology Today Article (June 2005)..... 653 653</p> <p>19 26 Record of FDA Contact..... 659 659</p> <p>20 27 Approvable Letter Package (12/21/93).... 664 664</p> <p>21 28 Package Insert for Neurontin 670 669 (Gabapentin Capsules)</p> <p>22 29 Record of FDA Contact (12/29/93)..... 671 671</p> <p>23 24 25</p>
<p style="text-align: right;">372</p> <p>1 APPEARANCES:</p> <p>2 KENNETH B. FROMSON, ESQUIRE Finkelstein & Partners 3 785 Broadway 3rd Floor 4 Kingston, New York 12401 (800) 634-1212 Ext. 2755 Attorney for Plaintiffs</p> <p>5 RICHARD M. BARNES, ESQUIRE MICHAEL J. WASICKO, ESQUIRE 6 Goodell, DeVries, Leech & Dann, LLP One South Street 7 20th Floor Baltimore, Maryland 21202 8 (410) 783-4000 -and-</p> <p>9 VINCENT E. GUNTER, ESQUIRE LORI C. MCGRODER, ESQUIRE (via telephone) 10 Shook, Hardy & Bacon, LLP 2555 Grand Boulevard 11 Kansas City, Missouri 64108-2613 (816) 474-6550 Attorneys for Defendant, Pfizer, Inc.</p> <p>12 ANNAMARIE A. DALEY, ESQUIRE (via telephone) Robins, Kaplan, Miller & Ciresi L.L.P. 13 2800 LaSalle Plaza 800 LaSalle Avenue 14 Minneapolis, Minnesota 55402 (612) 349-8500 Attorney for Plaintiff, Assurant</p> <p>15 ELANA GOLD, ESQUIRE (via telephone) Law Office of Steven Hillyard 16 345 California Street Suite 1770 17 San Francisco, California 94104 (415) 334-6880 Attorney for Raymond Jennings, M.D.</p> <p>18 ALSO PRESENT: 19 KEITH ALTMAN, Finkelstein & Partners 20 DAVID LEGGETT, Videographer</p> <p>21 22 23 24 25</p>	<p style="text-align: right;">374</p> <p>1 EXHIBITS</p> <p>2 ID MARK</p> <p>3 30 Record of FDA Contact (12/22/93)..... 672 672</p> <p>4 31 Letter from Robert Temple, M.D., to 692 692 Janeth Turner with Approval Letter (12/30/93)</p> <p>5 32 e-mail from Courtney Calder to Manini .. 705 704 Patel (11/22/05)</p> <p>6 33 Joint Response Assessment Report on 710 708 List of Outstanding Issues, Neurontin and Associated Tradenames (Gabapentin)</p> <p>7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

<p>719</p> <p>1 My question to you is, will you entertain my 2 request to make certain inquiries of Dr. Blume this 3 evening? 4 MR. BARNES: No, I will not. It's after 6:00, 5 and we've scheduled two days and I have a flight to 6 catch, so I cannot stay and entertain your request. 7 And I have not concluded my examination, so I 8 cannot can accede to your request. 9 I would -- I would suggest that counsel for 10 the parties have a meet and confer to decide the 11 best way to proceed at this point. 12 I thank the doctor for her time and we will -- 13 well, we will ask the court for relief and the 14 opportunity to continue this deposition. I thank 15 everyone for their participation. Thank you. 16 MR. FROMSON: Thank you. 17 MR. BARNES: And we'll go off the record at 18 this point. 19 THE VIDEOGRAPHER: Off the record 6:08 p.m. 20 (Deposition concluded at 6:08 p.m.) 21 22 23 24 25</p>	<p>721</p> <p>1 CERTIFICATE OF OATH 2 3 STATE OF FLORIDA 4 COUNTY OF HILLSBOROUGH 5 6 I, the undersigned authority, certify that 7 CHERYL D. BLUME, Ph.D., personally appeared before me 8 and was duly sworn. 9 10 WITNESS my hand and official seal this _____ 11 day of November, 2007. 12 13 _____ 14 Valerie A. Hance, RPR 15 Notary Public - State of Florida 16 My Commission Expires: 09/17/08 17 Commission No. DD332610 18 19 20 21 22 23 24 25</p>
<p>720</p> <p>1 WITNESS' SIGNATURE PAGE 2 3 4 I have read the foregoing pages, and 5 except for any changes or amendments I 6 have indicated on the sheet attached 7 for such purposes, I hereby subscribe 8 to the accuracy of the transcript. 9 10 11 12 _____ 13 CHERYL D. BLUME, Ph.D. 14 15 _____ 16 DATE 17 18 _____ 19 WITNESS TO SIGNATURE 20 21 22 23 24 25</p>	<p>722</p> <p>1 REPORTER'S CERTIFICATE 2 3 STATE OF FLORIDA 4 COUNTY OF HILLSBOROUGH 5 6 I, Valerie A. Hance, Registered Professional 7 Reporter, certify that I was authorized to and did 8 stenographically report the deposition of 9 CHERYL D. BLUME, Ph.D., Volume 2, pages 371 through 722; 10 that a review of the transcript was requested; and that 11 the transcript is a true and complete record of my 12 stenographic notes. 13 14 I further certify that I am not a relative, 15 employee, attorney, or counsel of any of the parties, 16 nor am I a relative or employee of any of the parties' 17 attorney or counsel connected with the action, nor am I 18 financially interested in the action. 19 20 Dated this ____ day of November, 2007. 21 22 _____ 23 Valerie A. Hance, RPR 24 25</p>

<p>1 SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK</p> <p>2</p> <p>3 - - - - - X</p> <p>4 IN RE: NEW YORK NEURONTIN : PRODUCTS LIABILITY LITIGATION : :Case Management. 5 vs. :Index No. 765000/2006 :Hon. Marcy S. Friedman</p> <p>6 THIS DOCUMENT APPLIES TO ALL : CASES :</p> <p>7 - - - - - X</p> <p>8</p> <p>9</p> <p>10</p> <p>11 DEPOSITION OF: CHERYL D. BLUME, PH.D.</p> <p>12</p> <p>13 DATE: February 29, 2008</p> <p>14 TIME: 12:57 p.m. to 2:52 p.m.</p> <p>15</p> <p>16 PLACE: 13902 N. Dale Mabry Hwy Tampa, Florida</p> <p>17</p> <p>18 BEFORE: CAROLYN R. LOUDEN, RPR Notary Public, State of Florida at Large</p> <p>19</p> <p>20 Pages 1 - 92</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>3</p> <p>1 CHERYL D. BLUME, Ph.D.,</p> <p>2 the witness herein, being first duly sworn on oath, was</p> <p>3 examined and deposed as follows:</p> <p>4 THE WITNESS: I do.</p> <p>5 DIRECT EXAMINATION</p> <p>6 BY MS. MCGRODER:</p> <p>7 Q. Dr. Blume, you agree the FDA alert expressly</p> <p>8 states that posting this information does not mean that</p> <p>9 FDA has concluded there is a causal relationship between</p> <p>10 the drug products and the emerging safety issue? You</p> <p>11 agree?</p> <p>12 A. I agree that FDA stated that.</p> <p>13 Q. And the FDA also states that it is not</p> <p>14 advising healthcare providers to discontinue prescribing</p> <p>15 these products. Agree?</p> <p>16 A. Agree.</p> <p>17 Q. So doctors today are still prescribing</p> <p>18 Neurontin?</p> <p>19 A. I don't know, but I would think so.</p> <p>20 Q. Do you agree that the Neurontin specific</p> <p>21 controlled clinical trial data do not show an increased</p> <p>22 risk of suicide?</p> <p>23 A. I do not believe I saw any suicides in the</p> <p>24 placebo-controlled studies.</p> <p>25 Q. When you read the FDA alert, what did it tell</p>
<p>2</p> <p>1 APPEARANCES:</p> <p>2 ANDREW G. FINKELSTEIN, ESQUIRE Finkelstein & Partners, LLP 3 436 Robinson Avenue Newburgh, New York 12550 4 (845) 562-3492 Attorney for Plaintiff</p> <p>5</p> <p>6 LORI CONNORS MCGRODER, ESQUIRE VINCE GUNTER, ESQUIRE (Via teleconference) Shook, Hardy & Bacon, LLP 7 2555 Grand Boulevard Kansas City, Missouri 64108 8 (816) 474-6550 -and-</p> <p>9 MICHAEL J. WASICKO, ESQUIRE Goodell, DeVries, Leech & Dann, LLP 10 One South Street, 20th Floor Baltimore, Maryland 21202 11 (410) 783-4000 Attorney for Defendants Pfizer and Warner-Lambert Company, LLC</p> <p>12 INDEX</p> <p>13</p> <p>14 DIRECT EXAMINATION BY MS. MCGRODER 3</p> <p>15 WITNESS' SIGNATURE PAGE 90</p> <p>16 CERTIFICATE OF OATH 91</p> <p>17 REPORTER'S CERTIFICATE 92</p> <p>18 EXHIBITS</p> <p>19 (No exhibits marked.)</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>4</p> <p>1 you about Neurontin that you did not know when you wrote</p> <p>2 your report?</p> <p>3 And I'm not talking about other antiepileptic</p> <p>4 drugs, specifically with respect to Neurontin.</p> <p>5 A. The report told me that FDA had spent two or</p> <p>6 three years following the receipt of the requested data</p> <p>7 and reviewed the various reports from different</p> <p>8 perspectives and concluded that across the category of</p> <p>9 antiepileptics there was an increased risk of suicide</p> <p>10 behavior and that the risk was found across all the</p> <p>11 members studied.</p> <p>12 Q. Okay. That wasn't my question. My question</p> <p>13 was specific to Neurontin. What did you learn about</p> <p>14 Neurontin, when you read that FDA alert, that you did</p> <p>15 not know when you wrote your Neurontin report?</p> <p>16 A. I learned that FDA reviewed the data that was</p> <p>17 provided to them and analyzed the data and included</p> <p>18 Neurontin in the group of 11 drugs for which they found</p> <p>19 an increase in suicide behavior and that that applied to</p> <p>20 Neurontin, as well as to the other ten members in the</p> <p>21 group.</p> <p>22 Q. You do not know what the incidence of suicide</p> <p>23 behaviors or ideation is for any of the specific drugs</p> <p>24 identified in that report other than Neurontin, correct?</p> <p>25 A. Correct. I do not have those databases, and I</p>

<p style="text-align: right;">89</p> <p>1 A. I don't think so, unless I was repeating what 2 somebody had said. I have no idea. 3 Q. Do you know if any of the lawyers representing 4 the plaintiffs in this litigation have said that? 5 A. I don't know. 6 Q. Well, would it trouble you if they had? 7 MR. FINKELSTEIN: It would trouble me. 8 THE WITNESS: Yeah. I would disagree with it 9 based on my 30 years of interacting with the FDA. 10 BY MS. McCRODER: 11 Q. Well, are you aware that one of the lawyers 12 representing the plaintiffs in this litigation, in which 13 you're offering opinions on behalf of the plaintiffs, 14 characterized the FDA on national TV last week as a 15 bunch Of Grade D high school students? Were you aware 16 of that? 17 MR. FINKELSTEIN: Objection. 18 THE WITNESS: No. I don't have any idea to 19 what you are referring. 20 BY MS. McCRODER: 21 Q. But you wouldn't agree with it? 22 A. I'm sure, as my testimony has pointed out, I 23 never would say that about the FDA, and I don't agree 24 with it. 25 MS. McCRODER: I have no more questions.</p>	<p style="text-align: right;">91</p> <p>1 CERTIFICATE OF OATH 2 3 STATE OF FLORIDA) 4 COUNTY OF HILLSBOROUGH) 5 6 I, the undersigned authority, certify that 7 CHERYL D. BLUME, Ph.D., personally appeared before me 8 and was duly sworn. 9 WITNESS my hand and official seal this 3rd 10 day of March, 2008. 11 12 13 _____ 14 CAROLYN R. LOUDEN, RPR 15 16 Notary Public - State of Florida 17 18 My Commission Expires: 9/5/09 19 20 Commission Number: DD 468262 21 22 23 24 25</p>
<p style="text-align: right;">90</p> <p>1 MR. FINKELSTEIN: Okay. Great. 2 (Deposition concluded at 2:52 p.m.) 3 WITNESS' SIGNATURE PAGE 4 I have read the foregoing pages, and, 5 except for any changes or 6 amendments I have indicated on the 7 sheet attached for such purposes, 8 I hereby subscribe to the accuracy 9 of this transcript. 10 11 _____ 12 CHERYL D. BLUME, Ph.D. 13 14 _____ 15 DATE 16 17 _____ 18 WITNESS TO SIGNATURE 19 20 21 22 23 24 25</p>	<p style="text-align: right;">92</p> <p>1 REPORTER'S CERTIFICATE 2 3 STATE OF FLORIDA) 4 COUNTY OF HILLSBOROUGH) 5 I, CAROLYN R. LOUDEN, Registered Professional 6 Reporter, certify that I was authorized to and 7 did stenographically report the deposition of 8 CHERYL D. BLUME, Ph.D.; that a review of the transcript 9 was requested; and that the transcript is a true and 10 complete record of my stenographic notes. 11 12 I further certify that I am not a relative, 13 employee, attorney or counsel of any of the parties, 14 nor am I a relative or employee of any of the parties' 15 attorneys or counsel connected with the action, nor am 16 I financially interested in the action. 17 18 Dated this 3rd day of March, 2008. 19 20 _____ 21 CAROLYN R. LOUDEN, RPR 22 23 24 25</p>